

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 25  
SUBREGION 33**

**SPRINGFIELD URBAN LEAGUE, INC.**

**and**

**Case 25-CA-248142  
25-CA-248144  
25-CA-258335**

**AMERICAN FEDERATION OF STATE, COUNTY  
AND MUNICIPAL EMPLOYEES (AFSCME),  
COUNCIL 31, AFL-CIO**

**RESPONDENT'S MOTION FOR PARTIAL DISMISSAL OF THE AMENDED  
COMPLAINT**

COMES NOW, the Respondent, SPRINGFIELD URBAN LEAGUE, INC., by and through its attorneys, Giffin, Winning, Cohen & Bodewes, P.C., and for its Motion for Partial Dismissal of the Complaint states as follows:

**Facts**

1. On November 3, 2020, an *Order Consolidating Cases, Consolidated Complaint and Notice of Hearing* was electronically filed in case numbers 25-CA-248142 and 25-CA-248144.
2. On November 12, 2020, the Respondent filed its *Answer to Consolidated Complaint and Affirmative Defenses* in case numbers 25-CA-248142 and 25-CA-248144.
3. On December 2, 2020, the Respondent filed a *Motion for Partial Dismissal of Consolidated Complaint* in case numbers 25-CA-248142 and 25-CA-248144.
4. On January 19, 2021, the Charging Party filed its *Response in Opposition to Respondent's Motion for Partial Dismissal of Consolidated Complaint* in case numbers 25-CA-248142 and 25-CA-248144.

5. On January 26, 2021, the Respondent filed its *Reply to Charging Party's Response in Opposition to Respondent's Motion for Partial Dismissal of Consolidated Complaint* in case numbers 25-CA-248142 and 25-CA-248144.

6. On January 26, 2021, the Petitioner filed its *Opposition to Respondent's Motion for Partial Dismissal of Consolidated Complaint* in case numbers 25-CA-248142 and 25-CA-248144.

7. On January 15, 2021, an amended *Order Consolidating Cases, Consolidated Complaint and Notice of Hearing* (hereinafter referred to as "Amended Complaint") was electronically filed in case numbers 25-CA-248142, 25-CA-248144, and 25-CA-258335.

8. The Amended Complaint added an additional allegation of failure to respond to an information request on or about March 26, 2020.

9. On January 29, 2021, Respondent filed its *Answer to Consolidated Complaint* in case numbers 25-CA-248142, 25-CA-248144, and 25-CA-258335.

### **Argument**

10. Respondent re-asserts and incorporates its *Motion for Partial Dismissal of Consolidated Complaint* as if stated herein. A true and exact copy of Respondent's *Motion for Partial Dismissal of Consolidated Complaint* is attached hereto and incorporated by reference as **Exhibit A**.

### **Conclusion**

WHEREFORE, the Respondent, Springfield Urban League, Inc., respectfully requests the following:

- (a) The allegations in Paragraphs 7(a) – (c) and 10 of the Complaint be dismissed;
- (b) The allegations in Paragraphs 5 and 9 of the Complaint be dismissed and
- (c) For all other relief the Board deems equitable and just.

Respectfully Submitted,

SPRINGFIELD URBAN LEAGUE, INC.,  
Respondent

A handwritten signature in blue ink, appearing to be 'S. Bobor', is written over a faint, circular, textured background.

By:

\_\_\_\_\_  
One of Its Attorneys

**Attorneys for Respondent**

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## **CERTIFICATE OF SERVICE**

Samantha A. Bobor, an attorney, hereby certifies that on January 26, 2021, she caused a copy of the foregoing *Respondent's Motion for Partial Dismissal of the Amended Complaint* to be served by email on the following:

Patricia K. Nachand, Regional Director  
Patricia.nachand@nlrb.gov  
Regional Director  
NATIONAL LABOR RELATIONS BOARD  
REGION 25/SUBREGION 33  
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/s/ Samantha A. Bobor  
Samantha A. Bobor